



Mayor of Greenfield <mayor@greenfield-ma.gov>

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## Fwd: Pay Equity Status Update

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**William Martin** <william.martin@greenfield-ma.gov>

Mon, Dec 31, 2018 at 12:21 PM

To: Diana Letourneau <diana.letourneau@greenfield-ma.gov>, "J. D. Mark Smith" <mark.smith@greenfield-ma.gov>, Lindsay Rowe <lindsay.rowe@greenfield-ma.gov>

Cc: Liz Gilman <liz.gilman@greenfield-ma.gov>, Mayor of Greenfield <mayor@greenfield-ma.gov>

FYI/WM

Agenda item for Group meeting.

----- Forwarded message -----

From: **Brendan Hughes** <Brendan.Hughes@sullivanandhayes.com>

Date: Fri, Dec 28, 2018 at 9:37 AM

Subject: Pay Equity Status Update

To: [william.martin@greenfield-ma.gov](mailto:william.martin@greenfield-ma.gov) <[william.martin@greenfield-ma.gov](mailto:william.martin@greenfield-ma.gov)>

Cc: Diana Letourneau <[diana.letourneau@greenfield-ma.gov](mailto:diana.letourneau@greenfield-ma.gov)>, Layla Taylor <[Layla.Taylor@sullivanandhayes.com](mailto:Layla.Taylor@sullivanandhayes.com)>, Linda Berrios <[Linda.Berrios@sullivanandhayes.com](mailto:Linda.Berrios@sullivanandhayes.com)>



### Privileged and Confidential

Dear Mayor Martin:

As you know, my office is working with Diana Letourneau to complete a pay equity audit in accordance with the Massachusetts Pay Equity Law which became effective July 1, 2018. Diana has asked that I provide you an update with respect to the status of the pay equity audit. The audit, which is very detail oriented contains multiple steps. The first step was to update all existing job descriptions for accuracy. Given the amount of jobs throughout the City, this process took several months. The second step is analysis of all the different job descriptions to establish job groupings. Job Groupings, for purposes of the statute, establish the jobs that must be compared for purposes of determining whether there are pay gaps. These groupings are not simply based on department. Rather, these groupings are based on whether or not different positions require "substantially similar skill, effort, and responsibility, and is performed under similar working conditions." This office is in the process of finalizing the groupings. This process, which needs to be thorough to comply with the statute, has required detailed analysis of whether different positions in entirely different departments, i.e. an administrative position in the aging council versus an administrative position the HR department, need to be classified as comparable for this analysis.

Once the groupings are completed, all of the wage information is inputted into a spreadsheet tool provided by the Attorney General's Office. From there, a determination will need to be made as whether or not there are any

pay gaps that need to be addressed for purposes of complying with the law. Employers are obligated to implement a plan to remediate any pay gaps once they are discovered. Greenfield, however, has several bargaining units and will need to bargain any such plan with any of the affected Unions. Additionally, an acceptable remediation plan will not require Greenfield to immediately make pay adjustments. Such adjustments can be accomplished and implemented over time. In this regard, the statute requires Greenfield to make “reasonable progress” toward addressing impermissible pay inequities. Conservatively, finalization of the pay audit and completion of a remediation plan could take several more months. The remediation plan itself could span over more than one fiscal year.

While the guidelines do not provide for a specific timeline as when a pay equity audit and if necessary, a remediation plan needs to be finalized, Greenfield’s current timeline is reasonable and in good faith. This is especially so given the vast amount of different job departments that exist in the City. Survey of our other clients indicates Greenfield is on track with and in many instances further along in the pay audit process. We will continue to diligently work on this audit until completion and will be in touch with our findings and next steps as soon as feasible.

Realistically, any budget discussions regarding the pay audit are premature and speculative. As indicated, implementation of any plans will require negotiations with the respective unions which could be a lengthy process in and of itself.

I trust this email sufficiently updates you on the status of the pay audit. Do not hesitate to contact me with any questions that you may have.

Regards,

Brendan

*/s/ Brendan L. Hughes*

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